## **DowLohnes**

## REDACTED FOR PUBLIC INSPECTION

February 21, 2013

## VIA HAND DELIVERY AND ECFS

Marlene H. Dortch, Esquire Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, S.W. Suite TW-A325 Washington, D.C. 20554

Re:

LiveTV Airfone, LLC

**Annual Customer Proprietary Network Information Certification** 

EB Docket No. 06-36

Request for Confidentiality

Dear Ms. Dortch:

LiveTV Airfone, LLC ("LiveTV"), by its attorneys, hereby submits its annual customer proprietary network information ("CPNI") certification and, pursuant to Section 0.459 of the Commission's rules, hereby requests that the Commission afford confidential treatment to the certification.

LiveTV requests confidentiality on two grounds. First, public disclosure of the CPNI certification would give data brokers valuable information they could use in their attempts to defeat LiveTV's security mechanisms and safeguards. Second, much of the information provided in the certification, including information concerning LiveTV's data security procedures and customer complaints is proprietary, nonpublic information that is commercially valuable and the public disclosure of which would subject LiveTV to serious competitive harm. Each of these grounds is sufficient under Section 0.457(d) of the Commission's rules<sup>2</sup> to maintain the confidentiality of the CPNI certification.

<sup>47</sup> C.F.R. § 0.459.

<sup>&</sup>lt;sup>2</sup> 47 C.F.R. § 0.457(d).

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For these reasons, LiveTV requests that the Commission maintain the confidentiality of LiveTV's CPNI certification.

Please inform me if any questions should arise in connection with this request.

Respectfully submitted,

J.G. Harrington

Counsel to LiveTV Airfone, LLC

Attachment

[Attachment Redacted]